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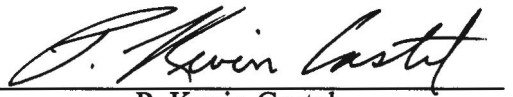
June 17, 2022

Via ECF

Hon. P. Kevin Castel, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 11D
New York, NY 10007

Application GRANTED. The conference scheduled for June 30, 2022 is adjourned to August 24, 2022 at 2:00 p.m. in Courtroom 11D.

Dated: New York, NY
06/21/2022


P. Kevin Castel
United States District Judge

Re.: **Lisa Santiago v. InterContinental Hotels Group Resources, Inc., et al.**
Case No. 20-cv-09721 (PKC)

Dear Judge Castel:

This firm represents defendants InterContinental Hotels Group Resources, Inc., InterContinental Hotels Group Resources, Inc. d/b/a Candlewood Suites Nanuet-Rockland County, Inter-Continental Hotels Corporation, Six Continents Hotels, Inc. in the above-referenced action.

We submit this letter motion requesting an extension of time to submit a pre-motion letter requesting approval for a potential motion for summary judgment motion by the defendants which is currently due today. At this point in time, such a pre-motion letter is premature given that expert discovery is not complete, and it is unknown at present whether Plaintiff will be retaining a liability expert to address any claimed defects at the subject hotel. Our decision whether to file a motion for summary judgment motion will be clearer at such time as Defendant's have some certainty on whether Plaintiff will be serving a liability expert report. There is a post-discovery conference in this case scheduled for June 30, 2022.

This is Defendants' first request for an adjournment of this deadline. Defendants have received consent from Plaintiff for this request.

Based on the above, Defendants respectfully request an extension of time to file a pre-motion letter requesting approval to file a summary judgment motion until after expert discovery is completed.

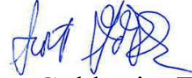
Santiago v. InterContinental Hotels Group Resources, Inc., et al.

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Should the Court have any questions, please do not hesitate to reach us.

Respectfully submitted,



Scott Goldstein, Esq.

cc: Frank Rizzo, Esq. (via ECF)